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January 2, 2020

BY ECF

Hon. Margo K. Brodie
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn New York 11201

Re: 1:19-cv-07279 (MKB-RER) Genius Media Group Inc. v. Google LLC and
Lyricfind: **Request to Set Time to File Motion To Remand and Time To Respond**

Dear Judge Brodie:

I am litigation counsel to Defendant LyricFind, Inc., erroneously sued as LyricFind. I write on behalf of all parties (Plaintiff Genius Media Group, Inc. and Defendant Google, LLC) who have met and conferred concerning the issues presented by the removal of this case to Federal Court and the upcoming scheduling issues of all counsel.

We have mutually agreed to the following schedule with respect to Genius' anticipated Motion to Remand:

1. Genius' deadline to Move to Remand this matter to State Court shall be filed on or before February 6, 2020 (the "Remand Motion"); and
2. Defendants' opposition to the Remand Motion is due on or before February 28, 2020; and
3. Genius' Reply is on or before March 11, 2020; and

Defendants' time to respond to the Complaint is due thirty (30) days following the decision on the Remand Motion. No previous requests for adjournment or extension have been made.

Thank you for your consideration in this matter. Respectfully submitted,

/s/Kenneth D. Freundlich
Kenneth D. Freundlich, Esq.

cc: All counsel via ECF